1		Magistrate Judge Donohue
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7	UNITED STATES DISTRICT COURT FOR THE	
8	WESTERN DISTRICT OF WASHINGTON AT SEATTLE	
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10	IN THE MATTER OF THE GRAD CHAO	NO MILE 010
11	IN THE MATTER OF THE SEARCH OF:	NO. MJ15-018 MJ15-021
12		MJ15-037
	Cellular Telephone 775-301-7664;	MJ15-111
13	2005 Ford Explorer;	MJ15-112
14	Garmin GPS unit; Public Storage, Unit C627;	MJ15-119 MJ15-352
15	Cellular Telephone 206-604-7480; and,	NIJ 13-332
16	2001 Mercedes	MOTION TO UNSEAL
17		
18		
19	The United States of America, by Annette L. Hayes, United States Attorney for	
20	the Western District of Washington, and Thomas M. Woods and Vincent T. Lombardi,	
21	Assistant United States Attorneys, submits this motion for an Order unsealing the above-	
22	listed search warrants.	
23	On August 5, 2015, the charging documents in the matter for which these warrants	
24	were issued were unsealed and numerous targets were arrested. As such, there no longer	
25	exists a necessity to maintain the search warrant, search warrant return, application and	
26	affidavit in support of the same, and all attachments in this matter, under seal.	
27	Furthermore, these search warrant materials are subject to discovery.	
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1 For the reasons described herein, the United States hereby requests that the above-2 referenced sealed items be unsealed in their entirety. 3 4 DATED this 5th day of August, 2015. 5 6 Respectfully submitted, 7 ANNETTE L. HAYES 8 Acting United States Attorney 9 /s/ Thomas M. Woods 10 THOMAS M. WOODS VINCENT T. LOMBARDI 11 **Assistant United States Attorney** 12 United States Attorney's Office 700 Stewart Street, Suite 5220 13 Seattle, Washington 98101-1271 14 Phone: 206-553-7970 E-mail: thomas.woods2@usdoj.gov 15 16 17 18 19 20 21 22 23 24 25 26 27 28